



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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MAY 27 2010

Ref: 8EPR-N

Charles Richmond, Forest Supervisor
GMUG National Forest
2250 Highway 50
Delta, CO 81416

Brian St. George, Field Manager
Bureau of Land Management,
Gunnison Field Office
216 N. Colorado Street
Gunnison, CO 81230-2197

Re: Gunnison Basin Federal Lands
Travel Management Final
Environmental Impact Statement
CEQ # 20100148

Dear Messrs. Richmond and St. George:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) for the Gunnison Basin Federal Lands Travel Management in accordance with EPA's responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. This FEIS was prepared jointly by the U.S. Forest Service (FS) and the U.S. Bureau of Land Management (BLM) to analyze the effects of modifying the current travel plan for motorized and mechanized vehicles on federal lands in the Gunnison Basin managed by their agencies. Specifically, these federal lands are administered by the FS on the Gunnison and Paonia Ranger Districts of the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) and by BLM on the Gunnison Field Office area. The purpose of changing the existing travel management plan is to complete route by route assessments of existing roads and trails to determine which are needed to provide for a range of recreational users while balancing resource protection and access needs.

As we stated in our June 3, 2009 comment letter on the Draft EIS (DEIS), EPA acknowledges the difficulty of achieving this balance. The No Action Alternative and three action alternatives (i.e., Alternative 2 – the Proposed Action; Alternative 3 – focused on route selection based on natural resource protection objectives, and Alternative 4 – focused on recreational opportunities) were analyzed in the DEIS. In our letter, EPA stated that Alternative 3 is the environmentally preferable alternative. In the FEIS, FS and BLM introduced a new alternative, Alternative 5 – the Preferred Alternative. The agencies wrote, "After considering the public comments on the DEIS

and re-evaluating the environmental consequences, the agencies have identified a Preferred Alternative in the FEIS that is believed to best define a transportation network of roads, motorized and non-motorized trails that is intended to provide for a sustainable system of roads and trails that meets the management objectives for federal lands while providing for recreational use, access, and resource protection.”

While it is true that the environmental impacts in the Preferred Alternative are less than with the Proposed Action, Alternative 3 appears to be the most environmentally sensitive alternative. For example, in Table 3-10, which compares alternatives using watershed metrics, the reduction in roaded water influence zones is 22 percent for Alternative 5 – the Preferred Alternative, greater than the 18 percent for Alternative 2 – the Proposed Action. However, the percentage reduction for Alternative 3 is 29.1 percent.

EPA is satisfied that its primary concerns with the DEIS have been adequately addressed in this FEIS. In particular, EPA is pleased that the agencies responded to our comments on the DEIS about watershed mitigation and restoration by adding specific information about watershed mitigation best management practices and watershed restoration. The response regarding EPA’s concern that many miles of trails on federal lands have not been inventoried for cultural resources was somewhat confusing. However, the fact that both agencies have programmatic agreements with the Colorado State Historic Preservation Office with protocols to be used to assess newly designated routes for cultural resource concerns, and that BLM has made a commitment to place particular emphasis on doing inventories for routes before any scheduled maintenance is performed was reassuring.

Regarding the document itself, there are major problems with the organization; it is not user-friendly. For example, the responses to comments made on the DEIS are located in the Appendix and are organized by resource, not commenting entity, making it difficult to determine if a comment has been adequately addressed in the FEIS. In addition, the table of contents does not include the Appendices and there is not a glossary in either volume (i.e., FEIS and Appendices). Finally, the maps for the Preferred Alternative are not available in the hard copy; they can only be found on a compact disc.

We appreciate the opportunity review this FEIS. If we may provide further explanation of our comments, please contact me at 303-312-6004 or Carol Anderson of my staff at 303-312-6449.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry Svoboda", with a stylized flourish at the end.

Larry Svoboda
Director, NEPA Compliance and Review Program
Ecosystems Protection and Remediation